

# Exhibit 2

**From:** [DeLuca, Justin](#)  
**To:** [J. Bryan Wood](#)  
**Cc:** [Hayes, John](#); [Proctor, Darcy](#); [Kostopoulos, Margaret](#); [Ryan O. Estes](#); ['Quinton Osborne'](#); [Benjamin D. Coate](#)  
**Subject:** RE: Nelson et al. v. Pace et al. - Urgent Requests  
**Date:** Monday, November 12, 2018 8:54:24 AM

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Bryan,

To follow up on your e-mail, please let me know if there is an alternative date for you to present your motion.

As to the discovery issues, again, we will not agree to the number and scope of the search terms you provided to us, even with your revised search parameters.

With regards to the personnel files, we will not object to the production of these documents. However, given the large volume of files, we will try and produce all of the files of current Pace employees by the end of this month, dependent on the size of these files. As for the personnel files of all employees from 2011 who are not currently employed, that will need additional time and we will try to produce those by the end of December, again dependent on the size of the files and the sheer volume of the documents requested.

Please let me know if you have any questions.

Thanks,

Justin

**Justin DeLuca, Attorney at Law**



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**From:** J. Bryan Wood [mailto:[bryan@jbryanwoodlaw.com](mailto:bryan@jbryanwoodlaw.com)]  
**Sent:** Sunday, November 11, 2018 10:01 PM  
**To:** DeLuca, Justin  
**Cc:** Hayes, John; Proctor, Darcy; Kostopoulos, Margaret; Ryan O. Estes; 'Quinton Osborne'; Benjamin D. Coate  
**Subject:** Nelson et al. v. Pace et al. - Urgent Requests  
**Importance:** High

J –

Per Judge Lee's orders, we're required to confer about all motions. Please let us know whether Defendants' oppose the attached motion for leave to file our Second Amended Complaint.

We plan to notice the motion for Thursday, November 15 (and have non-deposing attorneys handle any appearance that may be necessary). If that won't work for Defendants, please let us know.

We asked for a definitive position on the discovery issues relating to email and personnel files, but did not receive one. We understand Defendants have not agreed to Plaintiffs requests on either issue. If that's incorrect, please let us know immediately.

Best regards,

Bryan

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